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*Counsel to the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

**Case No. 19-23649 (RDD)

(Jointly Administered)**

**NOTICE OF PRESENTMENT OF
STIPULATION AND AGREED ORDER RESOLVING
THE NAS CHILDREN AD HOC COMMITTEE'S CHALLENGE LETTER**

PLEASE TAKE NOTICE THAT that on March 22, 2022, Purdue Pharma L.P. and certain of its affiliates, as debtors and debtors in possession in the above-captioned chapter 11

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

cases (collectively, the “**Debtors**”), filed the *Stipulation and Agreed Order Resolving the NAS Children Ad Hoc Committee’s Challenge Letter* (the “**Stipulation**”).

PLEASE TAKE FURTHER NOTICE that pursuant to the Stipulation between the Debtors, the NAS Children Ad Hoc Committee, and the Public School District Creditors, which the Official Committee of Unsecured Creditors participated in negotiating and supports, (i) certain documents listed therein will be downgraded to remove all confidentiality designations such that they are no longer covered by the *Third Amended Protective Order* [Dkt. No. 1935] (the “**Protective Order**”), and (ii) certain documents listed therein will maintain their confidentiality designations but may be used by parties subject to the Protective Order in any opioid-related litigation in which they are a party, but only in accordance with the respective protective order(s) and other orders in place in those proceedings.

PLEASE TAKE FURTHER NOTICE that, unless a written objection to the Stipulation is served and filed with proof of service with the Clerk of the Court, and a courtesy copy is delivered to the undersigned and to the chambers of the Honorable Robert D. Drain, so as to be received by **April 1, 2022 at 4:00 p.m. (prevailing Eastern Time)**, there will not be a hearing to consider the Stipulation, and the Stipulation will be presented for signature by the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, on **April 5, 2022 at 10:00 a.m. (prevailing Eastern Time)**. A copy of the Stipulation is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that, if a written objection is timely filed and served with respect to the Stipulation, a hearing (the “**Hearing**”) will be held to consider the Stipulation before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, on a date to be

announced, *provided* that, pursuant to General Order M-543, dated March 20, 2020 (Morris, C.J.) (“**General Order M-543**”), such Hearing shall be conducted via **Zoom for Government®** so long as General Order M-543 is in effect or unless otherwise ordered by the Bankruptcy Court.²

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and a failure to appear may result in relief being granted upon default, *provided* that objecting parties shall attend the Hearing via Zoom for Government so long as General Order M-543 is in effect or unless otherwise ordered by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that copies of the Stipulation and all related papers may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://restructuring.primeclerk.com/purduepharma>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

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² A copy of General Order M-543 can be obtained by visiting <https://www.nysb.uscourts.gov/news/generalorder-m-543-court-operations-under-exigent-circumstances-created-covid-19>.

Dated: March 22, 2022
New York, New York

Respectfully submitted,

/s/ James I. McClammy

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